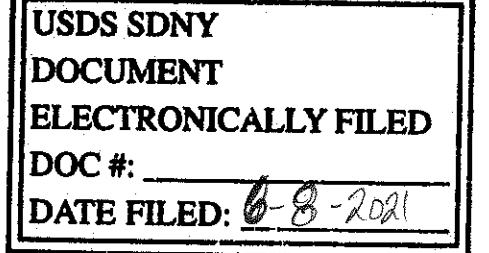


June 8, 2021

Via ECF Only

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312



**RE: Paulette St. Jean v. Cambridge Security Services Corp. and Mishelben Doshi,
*in her individual and official capacities,***
Case No. 19-CV-11453 (JGK) (SLC)

Dear Judge Koeltl:

This office represents Plaintiff, PAULLETE ST. JEAN, in the above-referenced matter. The Parties jointly write, pursuant to Your Honor's Rule I(A), regarding this matter. It has come to the Parties' attention that no scheduling order was ever put in place on this matter.

In the interim, the Parties have already exchanged the bulk of the discovery documents and information in this case, and scheduled depositions. The Parties now write, to respectfully request that the following proposed schedule be so-ordered:

Depositions to be completed by **July 31, 2021**

Deposition of Plaintiff (currently scheduled) **June 25, 2021**

Deposition of Defendant Mishelben Doshi (currently scheduled) **July 2, 2021**

Fact Discovery to be completed by **August 30, 2021**

** The additional time is to account for any unforeseen issues with scheduling that may occur

Status Report within **7 Days after the completion of Fact Discovery**

Expert Discovery (Exchanging of Reports and Depositions) to be completed by **October 31, 2021**

Dispositive Motions to Be Initiated within 30 days of the Discovery Deadline.

The Parties thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Yusha D. Hiraman
Gregory Calliste, Jr.
Yusha D. Hiraman
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CC: John R. Vreeland, Esq. (*via ECF*)
Harris Freier (*via ECF*)

Joint Pre-Trial Order due 12/20/21,
or 21 days after decision of any dispositive motion.
Ready-Trial, 48 hours notice, 21 days
after submission of Joint Pre-Trial Order.
So ordered.
JMG/Kelth
6/8/21 M.S.D.